



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EK:MPR
F.#2012R01666

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 12, 2014

By ECF and FedEx

Kevin Keating, Esq.
666 Old Country Road
Garden City, NY 11530

Re: United States v. Eduard Munteanu
Criminal Docket No. 12-698 (S-1) (SJF)

Dear Mr. Keating:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-captioned case, supplementing the discovery provided to you on December 18, 2012, February 7, 2013, April 4, 2013, October 4, 2013, October 22, 2013, December 30, 2013, January 7, 2014, January 9, 2014, January 16, 2014, January 23, 2014, February 4, 2014, and February 5, 2014. Any additional discovery will continue to be provided to you as it becomes available. The government continues to request reciprocal discovery.

Enclosed with this letter is a disc containing the following:

- Documents received from American Airlines, Bates numbered EM000002046 to EM000002094;
- Documents received from Pentagon Federal Credit Union, Bates numbered EM000002095 to EM000002114;
- Documents received from Sprint, Bates numbered EM000002115 to EM000002628;
- Documents received from Enterprise Car Rental, Bates numbered EM000002629 to EM000002652;
- Documents received from Public Storage, Bates numbered EM000002653 to EM000002663;

- One consensually recorded telephone call placed by defendant from the Metropolitan Detention Center (“MDC”) between January 4, 2014 and January 31, 2014 and documents related to that call, Bates numbered EM000002666 to EM000002677;
- A publicly-available picture located on Caitlin Harding’s Facebook page, Bates numbered EM000002678;
- Documents recovered from defendant’s computer, which were previously provided to you on February 4, 2014, Bates numbered EM000002679 to EM000002725.

Upon receiving defendant’s MDC telephone calls, all calls placed by defendant from the MDC to an attorney’s telephone number were segregated. Those attorney calls, which are Bates numbered EM000002726 to EM000002727, are being provided to you on a separate disc enclosed herewith. Neither the AUSAs nor the investigators involved in prosecution of the above-captioned case have listened to those calls.

Finally, in my December 30, 2013 letter to you, note that the document Bates Numbered EM000000159, which is a photocopy of two American Airlines baggage charge receipts, was incorrectly identified as having been provided by American Airlines. The baggage charge receipts were seized during the execution of the search warrant on defendant’s hotel room.

Please contact me if you have any questions.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Michael Robotti
Michael Robotti
Assistant U.S. Attorney
(718) 254-7576

Enclosures